

To: Honorable Judge Noel L. Hillman
United States District Court
District Of New Jersey
400 Cooper Street
Camden, New Jersey 08102

From: Jeremy Williams
RN: 63734-054
FPC-Schuylkill Unit-2
P.O. Box 670
Minersville, PA 17954-0670

RECEIVED
AUG 14 2014
AT 8:30 AM
WILLIAM T. WALSH CLERK

Re: Jeremy Williams v. Drug Enforcement Administration
Case No. 1:12-cv-00850-NLH-JS

Dated: August 10th, 2014

Dear Clerk,

Enclosed you will find plaintiff-claimant's supplemental response to the motion [15]. All concerned parties have been served as is reflected in the 'proof of service'. Kindly list the same before the court and please acknowledge receipt of this response.

I thank you for your time and attention.

Sincerely,

/s/
Jeremy Williams
Jeremy Williams

United States District Court
District Of New Jersey

Jeremy Williams
Plaintiff-Claimant

v.

Drug Enforcement Administration
Defendant-Respondents

:
:
:
: No. 1:12-cv-00850-NLH-JS

:
:
: Civil Action

:
:

Affidavit with Motion(s) For Reduction of Time For Defendant, DEA To Respond To Plaintiff's Interrogatories And Admissions Within 10 days; or For The Court To Give The Parties 75 days RE: Summary Judgement Restructuring, And For Leave To Amend The Complaint Under 42 USC § 1983, 1985, and Rule 41(g)

Comes now Jeremy Williams, and for the reasons, critical factual development needs to be presented. Since the court converted the pleadings into one for Summary Judgement under Fed. R. Civ. P., Rule 56, plaintiff hereby files this affidavit with motion(s) for reduction of time for defendant, DEA to respond to plaintiff's interrogatories and admissions within 10 days; or for the court to give the parties 75 days Re: Summary Judgement Restructuring, and for leave to amend the complaint under 42 USC § 1983, 1985, and Rule 41(g). For the following reasons:

1. On July 31st 2014, this honorable court ordered the pleadings between the parties to be converted from a motion to dismiss under 12(b) to one for Summary Judgement under Rule 56.
2. Plaintiff is a black male (African American) which the court may take **Judicial Notice** of from the court's files. And, it is because of his race why the DEA, white agents deprived him of his BMW and charged him with federal crimes in the first place. The following are the plaintiff's requested leave to amend his complaint.

42 USC § 1983-Civil Rights Violations

3. Jurisdiction exist pursuant to 42 USC § 1983. Plaintiff's rights to his property, A 2006 BMW was deprived by the defendant, DEA. And Agents deprived him of his rights to his property in violation of the U. S. Constitution; which secured his rights under color of law. And, such person or government entity is liable in civil penalty for such violations and wrongfully taking. See Exhibits 1-7. Plaintiff incorporates his original Complaint here.

42 USC § 1985-Conspiracy

4. Conspiracy to interfere with plaintiff's civil rights.

When the DEA and its agents unlawfully seized plaintiff's BMW it violated plaintiff's civil rights as they acted in a conspiracy to deprive plaintiff of his civil rights pursuant to the U. S. Constitution, 4th and 5th Amendment rights against unlawfully taking of his BMW without compensation. See Exhibits 1-7. Again Plaintiff incorporates his Complaint here.

41(g) Unlawfully Taking Of property

5. Plaintiff is aggrieved by the unlawfully seizure of his BMW by the DEA and its agents. And, if such is the case the complaint should be filed in the District Court where the property was seized; which is the District Court of New Jersey under civil action No. 1:12-cv-00850-NLH-JS. See Exhibits 1-7. Again Plaintiff's Complaint is realleged here as well.

Summary Judgement Should Be Denied, Genuine Undisputed Fact(s) Exist

6. All plaintiff need to show to defeat the government's, movant's, motion for Summary Judgement under Fed. R. Civ. P., Rule 56, is that there is a genuine issue of material fact in dispute. Here there are many facts in disputed as follows:

7. Plaintiff has alleged that his vehicle, A 2006 BMW was his and the government seized it in violation of his constitutional right under 41(g).

8. Plaintiff has alleged that the government deprived him of his BMW based on race (he is a black man and the takers were white men) in violation of his civil rights under 42 USC§ 1983 and in violation of the U. S. Constitution 4th and 5th Amendments, that they took his BMW based on race.

9. Plaintiff has alleged that the government, DEA, and its agents acted in a conspiracy to deprive him of his BMW in violation of 42 USC § 1985.

Plaintiff Hereby Seeks Leave Of Court To Renew His Complaint And Enhance Facts

10. The Court Allowed the defendant, DEA's sworn statements/declarations (not appropriate for the 12(b) motion) and accepted them as part of its created Summary Judgement. And, the court also required plaintiff to prove Jurisdiction of the court; and gave plaintiff 20 days to respond.

11. In order for plaintiff to defeat Summary Judgement plaintiff realleges that his BMW was taken by the government without a right of reasonable opportunity for plaintiff to defend. The BMWwas purchased from an automobile accident settlement involving (plaintiff insurance claim payment) in 2009. And there was neverany evidence or proof in plaintiff's plea (when the matter was U.S. v. Jeremy Williams) remotely connecting plaintiff's BMW to any crime or being used in anyway to further illegal drug activity.

Plaintiff incorporated every word above and below as well as exhibits 1-7 attached to all of these pleadings filed today with his combined affidavit. And, Relies on the court's inherent power and duty of fairness since plaintiff is a pro se litigant. And, has no compurter to re-state and re-type everything in pretty little sections.

12. Plaintiff has submitted his sworn affidavit, which alleges genuine issues of material facts which precludes the granting of a Summary Judgement particularly where the court is required to view the allegations of facts in the light most favorable to the non-movant party, plaintiff, Jeremy Williams, herein.

Points & Authorities

13. Plaintiff presents his case opposing Summary Judgement and cities the landmark case of Anderson v. Liberty Lobb, Inc., 477 U.S. 242, 248 (1986) et. al. Since both parties rely on Anderson v. Liberty Lobb, Inc., the pleadings submitted herein, with the additional pleadings to be supplemented by defendant's

(a) Admissions and (b) Answer to Interrogatories.

14. Plaintiff also, relies in this court's inherent powers and sense of reasons and judgement.

Plaintiff's car had nothing to do with his conviction and there is no evidence that plaintiff used his BMW to further any drug dealing or any illegality. See plaintiff's affidavit and motion(s).

Wherefore, it is respectfully requested that plaintiff's motion seeking jurisdiction of the court be granted and that the court denies any motion for Summary Judgement for the government, DEA.



Jeremy Williams
Jeremy Williams, Pro SE

Affidavit Under Oath

I, Jeremy Williams, State under peanlty of perjury, that to the best of my knoledge and belief the information and facts stated in this affidavit and in the motion(s) are true; and that if, and when called to testify in court, plaintiff would again sware before this court that every fact stated in this affidavit and motion(s) are true.

Dated: August 10th 2014


Jeremy Williams

Certificate Of Service

I, Jeremy Williams, Hereby certify that I did cause to be mailed A true and correct copy of the within Affidavit with Motion, and exhibits to the following, via first class postage, From FPC-Schuylkill, P.O. Box 670, Minersville, PA 17954 on this 10th day of August 2014; to:

Paul J. Fishman, esq.
United States Attorney
970 Broad Street, Suite 700
Newark, New Jersey 07102

Certificate In Lieu Of Oath

I, Jeremy Williams, hereby certify that the above statements made by me are true and correct, and I am aware of the penalties for false swearing. Invoking 28 USC § 1746, penalty of perjury.

Dated: August 10th 2014

/s/

Jeremy Williams

Page 1 of 2 Pages	New York State Department of Motor Vehicles POLICE ACCIDENT REPORT (NYC) MV-104AN (5/04)														
Precinct 49	Complaint Number 2136-			<input type="checkbox"/> AMENDED REPORT											
Accident Date Month 10 Day 18 Year 2009			Day of Week SUNDAY	Military Time 1330	No. of Vehicles 3	No. Injured 1	No. Killed 0	Not Investigated at Scene <input type="checkbox"/>		Left Scene <input type="checkbox"/>	Police Photos <input type="checkbox"/> Yes <input type="checkbox"/> No				
						<input type="checkbox"/> VEHICLE 2 BICYCLIST <input type="checkbox"/> PEDESTRIAN <input type="checkbox"/> OTHER PEDESTRIAN									
						<input type="checkbox"/> VEHICLE 2 Driver License ID Number 747 220 795		State of Lic. NY							
Driver Name - exactly as printed on license SANTIAGO, TAHNISHA, R						Driver Name - exactly as printed on license VERA, RICHARD									
Address (Include Number & Street) 919 TILDEN STREET			Apt. No. 2			Address (Include Number & Street) 1841 ROGART AVE		Apt. No. 2							
City or Town BRONX			State NY Zip Code 10469			City or Town BRONX		State NY Zip Code 10462							
Date of Birth Month 11 Day 03 Year 78 Sex F Unlicensed <input type="checkbox"/>			No. of Occupants / Public Property Damaged <input type="checkbox"/>			Date of Birth Month 09 Day 26 Year 63 Sex <input type="checkbox"/>		No. of Occupants / Public Property Damaged <input type="checkbox"/>							
Name - exactly as printed on registration WILLIAMS JEREMY						Name - exactly as printed on registration INFANTE RAFAEL, R									
Address (Include Number & Street) 17A/139 TH ST. A			Apt. No. 3E Haz. Mat. Code <input type="checkbox"/> Released <input type="checkbox"/>			Address (Include Number & Street) 168 HAYWARD ST.		Apt. No. Haz. Mat. Code <input type="checkbox"/> Released <input type="checkbox"/>							
City or Town NEW YORK, NY 10037						City or Town YONKERS		State NY Zip Code 10104-1807							
Plate Number FMH5790			State of Reg. NY Vehicle Year & Make 2002 JEEP SUBN			Vehicle Type Ins. Code 193		Plate Number BCP2752		State of Reg. NY Vehicle Year & Make 1998 DODGE SUBN		Vehicle Type Ins. Code 639			
Ticket/Accident Number(s)															
Violation Section(s)															
2 Check if involved vehicle is: <input type="checkbox"/> more than 95 inches wide; <input type="checkbox"/> more than 34 feet long; <input type="checkbox"/> operated with an overweight permit; <input type="checkbox"/> operated with an overdimension permit.				V E H I C L E 1 DAMAGE CODES Box 1 - Point of Impact 1 2 Box 2 - Most Damage 10 10				Check if involved vehicle is: <input type="checkbox"/> more than 95 inches wide; <input type="checkbox"/> more than 34 feet long; <input type="checkbox"/> operated with an overweight permit; <input type="checkbox"/> operated with an overdimension permit.				Circle the diagram below that describes the accident, or draw your own diagram in space #9. Number the vehicles. Rear End 1. Left Turn 3. Right Angle 5. Right Turn 7. Head On 2. Sideswipe (same direction) 4. Right Turn 6. Sideswipe (opposite direction) 8. FIRST EVENT. BOSTON RD. PARKED.			
3 C L E E 1 Enter up to three more Damage Codes 3 4 5				C L E E 2 VEHICLE 2 DAMAGE CODES Box 1 - Point of Impact 2 3 Box 2 - Most Damage 2 3				2 Vehicle By Towed: To							
Vehicle Damaged Coding: 1-13. SEE DIAGRAM ON RIGHT. 14. UNDERCARRIAGE 17. DEMOLISHED 15. TRAILER 18. NO DAMAGE 16. OVERTURNED 19. OTHER															
Reference Marker			Coordinates (if available)			Place Where Accident Occurred: <input checked="" type="checkbox"/> BRONX <input type="checkbox"/> KINGS <input type="checkbox"/> NEW YORK <input type="checkbox"/> QUEENS <input type="checkbox"/> RICHMOND									
			Latitude/Northing:			Road on which accident occurred BOSTON RD (Route Number or Street Name)									
			Longitude/Easting:			at 1) intersecting street YATES AV (Route Number or Street Name)									
						or 2) <input type="checkbox"/> N <input type="checkbox"/> S <input type="checkbox"/> E <input type="checkbox"/> W of _____ (Milepost, Nearest Intersecting Route Number or Street Name)									
Accident Description/Officer's Notes AT TPO VI STATED SHE WAS PROCEEDING THROUGH INTERSECTION WHEN SHE WAS STRUCK BY V2. V2 STATED VI WAS PROCEEDING THROUGH INTERSECTION AND STOPPED SUDDENLY CAUSING HIM TO COLLIDE INTO VI WHICH HE THEN LOST CONTROL OF HIS VEH WHERE HE COLLIDED INTO V3. VI REMOVED TO HOSPITAL.															
Names of all involved SANTIAGO, TAHNISHA, R VERA, RICHARD															
Date of Death Only															
A	8	9	- 10	11	12	13	14	15-	16	17	BY	TO	18		
A	1		4			F	10	14	6			7003	SANTIAGO, TAHNISHA, R		
B	2		4			M	-	6					VERA, RICHARD		
C															
D															
E															

USE COVER SHEET

PERSONS KILLED OR INJURED IN ACCIDENT (Letter designation of persons killed or injured must correspond with letter designation on front).

A Last Name <u>SANTIAGO</u>	First <u>TAHNISHA</u>	M.I. <u>R</u>	B Last Name	First	M.I.
Address <u>919 TILDEN ST. Z</u>			Address		
Date of Birth Month <u>11</u> Day <u>03</u> Year <u>78</u>	Telephone (Area Code) (<u> </u>)	Date of Birth Month Day Year	Telephone (Area Code) (<u> </u>)		
C Last Name	First	M.I.	E Last Name	First	M.I.
Address			Address		
Date of Birth Month Day Year	Telephone (Area Code) (<u> </u>)	Date of Birth Month Day Year	Telephone (Area Code) (<u> </u>)		
D Last Name	First	M.I.	Highway Dist. at Scene? <input type="checkbox"/> Yes <input type="checkbox"/> No Name:		
Address					
Date of Birth Month Day Year	Telephone (Area Code) (<u> </u>)			Shield No.	

ENTER INSURANCE POLICY NUMBER FROM INSURANCE IDENTIFICATION CARD, EXPIRATION DATE (IN ALL CASES), AND VIN.

Vehicle No. 1 A06-228-229680-40 8Vehicle No.2 4086493287Expiration Date 11/19/2009Expiration Date 01/27/2010VIN 1J8GW68J62C185159VIN ZB7HB11X6W1K124523

WITNESS (Attach separate sheet, if necessary)

Name	Address	Phone

DUPLICATE COPY REQUIRED FOR:

- | | | | |
|-----------------------------------------------------------------------------------|--------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
| <input type="checkbox"/> Dept. of Motor Vehicles
(if anyone is killed/injured) | <input type="checkbox"/> Motor Transport Division
(P.D. vehicle involved) | <input type="checkbox"/> NYC Taxi & Limousine Comm.
(if a Licensed taxi or limousine involved) | <input type="checkbox"/> Other City Agency
(Specify) _____ |
| <input type="checkbox"/> Office of Comptroller
(if a City vehicle involved) | <input type="checkbox"/> Personnel Safety Unit
(if a P.D. vehicle involved) | <input type="checkbox"/> Highway Unit _____ | _____ |

NOTIFICATIONS: (Enter name, address, and relationship of friend or relative notified. If aided person is unidentified, list Missing Person Squad member who was notified. In either case, give date and time of notification.)

PROPERTY DAMAGED (other than vehicles)

OWNER OF PROPERTY (include city agency, where applicable)

IF NYPD VEHICLE IS INVOLVED:

Police Vehicle Operator's First Name	Last Name	Rank	Shield No.	Tax ID No.	Command
Make of Vehicle	Year	Type of Vehicle	Plate No.	Dept. Vehicle No.	Assigned To What Command

Equipment in Use At Time of Accident

Officer's Rank	Signature	Print Name						
Tax ID No.	NIC ID No.	Post Sector	Reviewing Officer	49069	03030	Housing	49069	
Date/Time Reviewed								

CLAIM ORIG ADDRESS

PO BOX 1051
MONTGOMERY TWP, NY 18936-1051

CONTACT: SALA, TINA

PHONE: 800-252-5730

ACCIDENT DATE: 10/18/09

INSURED NAME: WILLIAMS, JEREMY

CLAIMANT NAME: WILLIAMS, JEREMY

CHECK REFERENCE 24107513	CHECK DATE 10/26/09
CHECK AMOUNT XXX\$4500.00	BLOCK NUMBER 001414

PAGE 1 OF 1

OSN: VV0101102601-001414

CLAIM NUMBER: 012684939-0001

POLICY NUMBER: A06-228-229680-408

INSURED OPERATOR: WILLIAMS, JEREMY

COVERAGE	INVOICE NO	DATES OF SERVICE	CHARGES	PAID AMT	ADJUSTMENTS
COLLISION			4500.00	4500.00	
PAYMENT TO: JEREMY WILLIAMS			TOTAL CHARGE: TOTAL PAID: TOTAL DEDUCTIBLE: TOTAL WITHHOLDING:	4500.00 4500.00 0.00 0.00	
			CHECK AMOUNT:	4500.00	

NOTES

THIS PAYMENT REPRESENTS PARTIAL PAYMENT ON THE TOTAL LOSS VALUE OF YOUR VEHICLE. COST TO REPAIR EXCEEDS THE VALUE OF YOUR VEHICLE PRIOR TO THE ACCIDENT.

Ex-2

2012-08-26 10:22:30

PLEASE REFERENCE CLAIM NO AND SEND THIS EOP WITH ALL CORRESPONDENCE

CAREFULLY DETACH CHECK BEFORE DEPOSITING - RETAIN STATEMENT FOR YOUR RECORDS



**Liberty
Mutual.**

The First Liberty Insurance Corporation
PO Box 1051

Montgomery Twp NY 18936-1051
Tel: (800) 252-5730 / (800) 252-5730
Fax: (800) 632-3689

November 02, 2009

JEREMY WILLIAMS
15 W 139TH ST APT 3E
NEW YORK NY 10037-1512

CLAIM NUMBER: PD203-012684939-01
DATE OF LOSS: 10/18/2009

Dear Mr. Williams:

The enclosed check for \$9244.31 represents the final payment for this loss.

Please Note: We will attempt to recover the full amount of your loss, including your deductible, from the other party involved in the accident. This recovery effort, or "subrogation," will be handled by our Islandia Subrogation Unit. The subrogation process usually takes some time and we will notify you as soon as we know the outcome.

It has been our pleasure to assist you with your claim. If you have questions about any aspect of your settlement, please call me at the number listed above, extension 7276537.

Sincerely,

MELISSA JEGEDE
Claims Department

Enclosure

PLEASE BE ADVISED THAT YOUR CHECK HAS BEEN SENT IN SEPARATE ENVELOPE.

TYPE OF SALE	
<input type="checkbox"/> WHOLESALE OR <input type="checkbox"/> RETAIL:	<input type="checkbox"/> New <input type="checkbox"/> Used <input type="checkbox"/> Demo <input type="checkbox"/> Salvage

New York State Department of Motor Vehicles
RETAIL CERTIFICATE OF SALE

No. 35247349

VEHICLE INFORMATION:

Year	Make	Model	Body Type	Color	Weight (Unladen)	Fuel Type	Cylinders	Adult Seating Capacity
06	BMW	320	LIM	GR	3071	G	6	4
Vehicle Identification Number			Lien(s)	Inspection Certificate Number		Date of Inspection	Inspection Station Number	
WBAVDR3B1GM505745			LC	NA		NA	70712410	
Plate/Permit Number		Number of Dealer Plate Loaned	<input type="checkbox"/> Lease Buyout (Insp. Not Required)		Selling Price \$			
NAT		NA						

DEALER INFORMATION (Print Name and Address)

Auction Service Rte 202 South P.O. Box 1001
Wappingers Falls, NY 12590

PURCHASER INFORMATION (Print Name and Address)

Westchester Muffler Shop, 714 Southern Blvd, Bronx, NY 10455
Date of Sale 10/28/09

PRIOR OWNER INFORMATION (Print Name and Address Source of Ownership)

Auction Service Rte 202 South P.O. Box 1001
Date of Purchase 10/28/09

ODOMETER DISCLOSURE STATEMENT

Federal and state laws require that you state the mileage of the vehicle described on this certificate, when transferring ownership. Failure to do so, or not telling the truth about the mileage may result in fines and/or imprisonment.

The odometer on the vehicle described above has: 5 digits 6 digits, not including tenths

I certify that, to the best of my knowledge, this odometer reading reflects the "ACTUAL MILEAGE" of the vehicle described above.

I certify that, to the best of my knowledge, this odometer reading "EXCEEDS MECHANICAL LIMITS."

I certify that, to the best of my knowledge, this odometer reading is "NOT THE ACTUAL MILEAGE. WARNING: ODOMETER DISCREPANCY."

ODOMETER READING	
169610	(no tenths)

DEALER CERTIFICATION:

I certify: The vehicle described above was sold to the purchaser on the date indicated. At the time of delivery the purchaser was entitled to register the vehicle. This vehicle complied with equipment requirements of the Commissioner's Regulations. At the time of delivery, such equipment was in condition and repair to render satisfactory and adequate service on the public highway under normal use. Equipment certification does not apply to a vehicle sold as new, wholesale, or salvage. All New York State and local taxes due as a result of this sale have been collected from the purchaser. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

DEALER (or authorized representative) - (SIGN full name)	PRINT full name of dealer or authorized rep.	Date	Dealers Facility No.
<i>Auction Service</i>	<i>Auction Service</i>	10/28/09	70712410
PURCHASER - (SIGN full name)	PRINT full name of purchaser	Date	Selling Dealer NYS Sales Tax No.
<i>John</i>	<i>John</i>	10/28/09	12282027

PART 3 — CUSTOMER COPY
ANY CHANGE OR ALTERATION VOIDS THIS CERTIFICATE

Ex-4

PO BOX 1051
MONTGOMERY TWP, NY 18936-1051

CONTACT: JEGEDE, MELISSA
PHONE: 800-252-5730



CHECK REFERENCE 24156402	CHECK DATE 11/03/09
CHECK AMOUNT 333854744.31	BLOCK NUMBER 001528

PAGE 1 OF 1

ACCIDENT DATE: 10/18/09

INSURED NAME: WILLIAMS, JEREMY

OSN: VV0101110301-001528

CLAIMANT NAME: WILLIAMS, JEREMY

CLAIM NUMBER: 012684939-0001

POLICY NUMBER: A06-228-229680-408

INSURED OPERATOR: WILLIAMS, JEREMY

COVERAGE	INVOICE NO	DATES OF SERVICE	CHARGES	PAID AMT	ADJUSTMENTS
COLLISION			9744.31	5244.31	99
PAYMENT TO: JEREMY WILLIAMS			TOTAL CHARGE: TOTAL PAID: TOTAL DEDUCTIBLE: TOTAL WITHHOLDING:	9744.31 5244.31 500.00 0.00	
			CHECK AMOUNT:	4744.31	

ADJUSTMENT CODE NOTES:

99 99 - OTHER

NOTES

THANK YOU FOR INSURING WITH LIBERTY MUTUAL

Ex-S

PLEASE REFERENCE CLAIM NO AND SEND THIS EOP WITH ALL CORRESPONDENCE

CAREFULLY DETACH CHECK BEFORE DEPOSITING - RETAIN STATEMENT FOR YOUR RECORDS

SO 2015
10/18/09

Exhibit A

WILLIAMS, JEREMY
 17 W 139 ST APT 3E
 NEW YORK NY 10037

000258

NEW YORK STATE							www.nydot.gov
Title and Identification No.			Year	Make	Model Code	Body/Hull	Document No.
WBAVD33596KV59575 WIBAVD33596KV59575			2006	BMW	330	4DSD	496749C
Color LT/BL	Wt./Sis./Lgh. 3671	Fuel GAS	Cyl./Prop. 6	New or Used USED	Type of Title VEHICLE	ODOMETER READING: 69612	Date Issued 11/19/09
Name and Address of Owner(s)				EXAMINER SIGNATURE			
WILLIAMS, JEREMY 17 W 139 ST APT 3E NEW YORK NY 10037							
<p>This document is your proof of ownership for this vehicle, boat or manufactured home. Keep it in a safe place. Not with your license or registration or in your vehicle or boat. To dispose of your vehicle, boat or manufactured home, complete the transfer section on the back and give this title to the new owner.</p> <p>Owner's Signature _____ Date _____</p> <p>Vehicle _____ Date _____</p> <p>_____ _____ _____</p>							

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ABRAMSON & MORAK
ATTORNEYS AT LAW
35 WORTH STREET
NEW YORK, NEW YORK 10013
www.abramsonmorak.com

ALAN M. ABRAMSON*
GLENN H. MORAK

ASHLEY M. HEANEY*

*MEMBER OF NEW YORK AND CONNECTICUT BARS

(212) 226-7098
FAX (212) 226-4559

September 21, 2010

Asset Forfeiture Section
Office of Operations Management,
Drug Enforcement Administration
8701 Morrisette Drive
Springfield, VA 22152

Re: DEA Case No.: C1-07-Z059
Asset ID No.: 10-DEA-535331

To Whom It May Concern:

My name is Jeremy Williams. On July 22, 2010, my 2006 BMW 330i was seized by the Drug Enforcement Administration.

I understand this vehicle was seized in connection with my arrest. This car was bought after the settlement of a car accident involving our 2002-Jeep Grand Cherokee. I have included my insurance information regarding payment to prove ownership.

Please accept this letter as my petition for pardon of forfeiture. I am requesting the return of my vehicle. Please feel free to communicate directly with the law firm of Abramson & Morak, 35 Worth Street, New York, NY 10011; Phone 212-226-7098.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 27, 2010.

Very truly yours,
Jeremy Williams
Jeremy Williams

SWORN TO ME THIS 27 OF SEPTEMBER 2010

Ashley M. Moore
NOTARY PUBLIC

ASHLEY M. MOORE
Notary Public, State of New York
NO. 02MO8172681
Qualified in New York County
Commission Expires Aug. 13, 2011

2010 SEP 29 PM 1:56
ASSET FORFEITURE SECTION
EX-7

Exhibit 11

Ex-7

1094

United States District Court
District Of New Jersey

Jeremy Williams
Plaintiff-Claimant

:
:
:
: No. 1:12-cv-00850NLH-JS

v.

:
:
:
: Civil Action

Drug Enforcement Administration :
Defendant-Respondents

Plaintiff's First Set Of Interrogatories To Defendant, DEA

Interrogatories to Defendant, DEA:

Comes now plaintiff, Jeremy Williams, files his request for interrogatories pursuant to Fed. R. Civ. P., Rule 33, since the court converted the parties pleadings from a motion to dismiss under 12(b) to one for Summary Judgment; the defendant answers to interrogatories is critical for plaintiff to respond to Summary Judgment. These are the interrogatories requests as follows:

1. State whether the government's entity named in this lawsuit is the proper party to be sued. And, if not who is the proper party.
2. State whether the government took plaintiff's BMW, A 2006 sedan automobile from plaintiff's home parking lot. And, if so name the division of the government who authorized the taking and the supervisor's name.
3. State whether the government took plaintiff's automobile without a warrant.
4. State whether the government gave any notice of the government's

seizure or attempted forfeiture occurred while plaintiff was incarcerated in Metropolitan Correctional Center, 150 Park Row, New York, NY 10007.

5. State whether the government under such circumstances plaintiff had no ability to exercise his right to claim automobile because he was fighting for his freedom.

6. State whether the government over the past 10 years under these facts and circumstances the government has been ordered by a court, with jurisdiction to return said automobile to the owner.

7. State whether the government in similar complaints the U.S. District Court's exercised jurisdiction particularly in personal property claim cases.

8. State whether the government in any separate hearing conducted by the government that no notice was ever submitted to plaintiff of a court date when the government sought to permanently deprive plaintiff of his BMW.

9. State whether the government acted to permanently deprive plaintiff of his BMW. The government knew where plaintiff was incarcerated, but failed to produce plaintiff with reasonable notice as required by the U. S. Constitution, 4th Amendment and 5th Amendment.

10. State whether the government on September 21, 2010 plaintiff's attorney's Abramson & Morak, submitted to the defendant, DEA, clearly proving that the subject BMW was purchased, and that plaintiff purchased it from proceeds of a automobile accident in 2009. See Exhibits 1-7.

11. State whether the government knew plaintiff did not use the said BMW to further any illegal drug activity. The DEA still

seized the automobile. And, is now trying to keep plaintiff's BMW in violation of the federal laws and U. S. Constitution.

12. State whether plaintiff is a black male and that the agents who deprived plaintiff of his BMW were white males; and name the said white males.

Notice To Defendant DEA

You are required to answer the above interrogatories questions and state the name of the person answering. And, if you will not agree to prove such answers within 10 days (as opposed to 30 days the law requires), the attached motion to shorten time to answer is hereby filed with the court.

Respectfully Submitted

Dated: August 10th 2014


Jeremy Williams

Certificate Of Service

I, jeremy Williams, Hereby certify that I did cause to be mailed a true and correct copy of the within Interrogatories and exhibits to the following, via first class postage, from FPC-Schuylkill, P. O. Box 670, Minersville, PA 17954 on This 10th day of August 2014; To:

Paul J. Fishman
United States Attorney
970 Broad Street, Suite 700
Newark, New Jersey 07102

Certificate InLieu Of Oath

I, Jeremy Williams, hereby certify that the above statements made by me are true and correct, and I am aware of the penalties for false swearing. Invoking 28 USC § 1746, penalty of perjury.

Dated: August 10th 2014

/s/ 
Jeremy Williams

United States District Court
District Of New Jersey

Jeremy Williams
Plaintiff-Claimant

:
:
:
: No. 1:12-cv-00850-NLH-JS

v.

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:
: Civil Action

Drug Enforcement Administration
Defendant-Respondents

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Plaintiff's Request for Admissions From Defendant and moves for reduction of time for Government to Respond

Request for Admissions to DEA:

Comes now plaintiff, Jeremy Williams, files his request for Admissions pursuant to Fed. R. Civ. P., Rule 36. Since the court converted the parties pleadings from a motion to dismiss under 12(b) to one for Summary Judgement; the defendant answers to Admissions is critical for plaintiff to respond to Summary Judgement. These are the Admissions requests as it follows:

1. Admit that the government entity named in this lawsuit is the proper party to be sued.
2. Admit that the government took plaintiff's automobile, a 2006 BMW sedan, from plaintiff's home parking lot.
3. Admit that the government took plaintiff's automobile without a warrant.
4. Admit that any notice of the government's seizure or attempted forfeiture occurred while plaintiff was incarcerated in Metropolitan Correctional Center, 150 Park Row, New York, NY 10007.
5. Admit that under such circumstances plaintiff had no ability to exercise his right to claim automobile; because he was fighting for his freedom.
6. Admit that the said BMW was not part of plaintiff's indictment and there was no mention of said BMW being a part of plaintiff's plea when he was a defendant in MCC, New York in the year 2010.

7. Admit that over the past 10 years under these facts and circumstances the government has been ordered by a court with jurisdiction to return said automobile(s) to the owner.
8. Admit that in similar complaints the U. S. District Court's exercised jurisdictions, particularly in personal property claim cases.
9. Admit that in any separate hearing conducted by the government, no notice was ever submitted to plaintiff of a court date when the government sought to permanently deprive plaintiff of his BMW.
10. Admit that when the government acted to permanently deprive plaintiff of his BMW, the government knew where plaintiff was incarcerated. But failed to provide plaintiff with reasonable notice as required by the U. S. Constitution, 4th and 5th Amendments.
11. Admit that on September 21, 2010, plaintiff's attorneys, Abramson & Morak, submitted to the defendant, DEA, clearly proving that the subject BMW was not a drug related purchase, and that plaintiff purchased it from proceeds of a automobile accident in 2009. See Exhibits 1-7.
12. Admit that eventhough the government knew plaintiff did not use the said BMW to further any illegal drug activity, the DEA still seized the automobile. And, is now trying to keep plaintiff's BMW in violation of the federal laws and U. S. Constitution.
13. Admit that the plaintiff is a black male and that the agents who deprived plaintiff of his BMW were white males; and name the said white males.

Notice To Defendant, DEA

You are required to answer the above Admissions questions and state the name of the person answering. And, if you will not agree to provide such answers within 10 days(the law allows 30), the attached motion to shorten time to answer is here by filed with the court.

Dated: August 10th 2014

Respectfully Submitted,


Jeremy Williams, Plaintiff

Certificaton Of Service

I, Jeremy Williams, Hereby certify that I did cause to be mailed a true and correct copy of the within Admissions and exhibits to the following, via first class postage, from FPC-Schuylkill, P. O. Box 670, Minersville, PA 17954 on This 10th day of August 2014; To:

Paul J. Fishman
United States Attorney
970 broad Street, Suite 700
Newark, New Jersey 07102

Certification In Lieu Of Oath

I, Jeremy Williams, hereby certify that the above statements made by me are true and correct, and I am aware of the penalties for false swearing. Invoking 28 USC § 1746, penalty of perjury.

Dated: August 10th 2014

/s/ Jeremy Williams
Jeremy Williams